



August 1, 2014

United States Environmental Protection Agency - Region 2  
DECA - PTSB - Toxic Substances (MS-105)  
2890 Woodbridge Avenue (MS-105)  
Edison, New Jersey 08837

Attn.: Henry Mazzucca, P.E., Chief

**Re: 13th Quarterly Status Report  
PCB Remedial Action  
Arsynco, Inc. Site  
Carlstadt, New Jersey**

Dear Mr. Mazzucca:

In accordance with Section 5 of the USEPA's *Approval for Risk-Based Clean-up/Disposal of Polychlorinated Biphenyl Remediation Waste* for the Arsynco site, which became effective on July 21, 2009 (the "EPA Approval"), the following provides the 13th Quarterly Status Report for the PCB remedial action at the Arsynco facility.

The following activities/actions have occurred in relation to the site since the last Status Report was submitted to EPA on April 10, 2014:

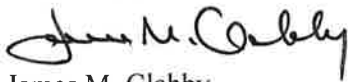
- Arsynco addressed numerous issues that require initiation and completion before the PCB remedy can be fully implemented. These issues/activities included:
  - a. the removal and proper off-site disposal of the former floor slab from Building 3 & 9 (as TSCA regulated waste);
  - b. the removal and proper off-site disposal of the former floor slab from Building 6 (as RCRA hazardous waste);
  - c. the collection of additional soil samples for PCB analysis from the area along the length of the drainage ditch that extends along a portion of the southern boundary of Tract 1 and that will require remediation in accordance with the EPA Approval;
  - d. the update of maps generated from the vast amount of PCB sample data recently collected at the site (over 3,500 additional samples);
  - e. the preparation of the planned scope of work for the PCB remediation program based on the review and evaluation of all PCB sample data from the site, including the determination of the planned size and location of the planned Consolidated Material TSCA Disposal Area on the site, which will be submitted to EPA shortly under separate cover, as required by the EPA Approval;

- f. a meeting was held with NJDEP on June 3, 2014 to discuss NJDEP's process and requirements associated with filing for and obtaining the necessary permits to perform the PCB remediation at this site, as remediation is required in both freshwater and coastal wetlands (drainage ditch and on Tract 2 of the site) and within an area designated as a Flood Hazard Area;
  - g. Arsynco is currently in the final stages of preparing the Multiple Permit Application to NJDEP for the required permits to conduct the PCB remediation on the site, including a Freshwater Wetlands General Permit #4 (GP4), a Coastal General Permit #15, a Waterfront Development Permit (in-water), a Waterfront Development Permit (upland), an Individual Flood Hazard Area Permit, and a NJDEP Section 401 Water Quality Certificate (final permit application package to be submitted to NJDEP in August 2014).
- Arsynco has also initiated and nearly completed the installation of the NJDEP-approved in-situ air sparge and soil vapor extraction (AS/SVE) treatment system on the site, as well as the completion of the permitting process for air discharge (NJDEP) and water discharge (BCUA) related to the AS/SVE system.
  - As noted in the last Status Report, Arsynco received a letter from EPA that provided EPA's comments on the financial assurance documents previously submitted by Arsynco. On January 6, 2012, Arsynco submitted an e-mail reply to EPA's letter. The e-mail response was submitted to Ms. Vickie Pane, of EPA, and requested clarification and specificity on EPA's comments to ensure that Arsynco's responses would fully satisfy EPA's requirements. On January 10, 2012, Arsynco submitted a second e-mail to Ms. Pane that provided a signed version of the letter of credit, which addressed one of the comments contained in EPA's October 2011 letter, and again requested a response from EPA clarifying the inquiries stated in the January 6, 2012 e-mail. As of the date of this letter, no response has been received from EPA on these issues.

The approval of the remaining financial surety issues is critical to allow the PCB remediation program at this site to move forward. Therefore, Arsynco respectfully requests EPA's timely review and response to the remaining financial surety questions.

Should you have any questions or require additional information regarding this matter, please feel free to contact me at (732) 295-2144.

Very truly yours,



James M. Clabby  
President

cc: James Haklar, USEPA  
Jay Nickerson, NJDEP